TRAFFIC AND TRANSPORTATION

SPECIFIC COMMENTS

1. **Page 4.11-1, Summary of Conclusions, Second Paragraph, Second Sentence:** This summary implies that the impacts are greater than they actually are. The alleged "significant impacts" appear to be temporary LOS D conditions during AM and PM peak at one intersection in the project area, and only occurring at peak workforce conditions. Moreover, this sentence implies that motorists and pilots will be significantly impacted by "distracting glint and glare." Applicant does not believe these conditions are significant adverse impacts as explained further in our comments.

2. **Page 4.11-1, Third Full Paragraph:** The content of this paragraph implies that peak construction traffic impacts occur at two study intersections: SR-78 (Neighbours Boulevard)/28th Avenue (LOS D PM) and SR-78 (Rannels Boulevard) (LOS D AM). The PSA utilizes "the most restrictive applicable LOS standard in Riverside County[] …", i.e., LOS C or above along all county-maintained roads and Conventional state highways. (Page 4.11-15 Table 6, footnote 4). Applicant requests that the short term degradation to LOS D at the two aforementioned locations during certain time periods not be considered as severe impacts requiring the implementation of a park-and-ride plan for the following reasons:

   a) California Department of Transportation (Caltrans) has jurisdiction and maintains the right-of-way of State Route 78 (SR-78). Caltrans District 8 maintains SR-78 from I-10 to the Imperial County Line while the remainder of SR-78 within Imperial County and San Diego County is maintained by Caltrans District 11.
   b) Caltrans' significant threshold criteria, as stated in Caltrans' Guide for the Preparation of Traffic Impact Studies, has not been exceeded by project traffic.

   c) According to the SR-78 Route Concept Report (RCR) prepared by Caltrans, the RCR "is a **planning document** (emphasis shown in bold) that describes the Department's basic approach to development of a given route. Considering financial constraints, characteristics of the highway, and projected travel demand over an approximate 20-year planning period, the RCR defines the type of facility and LOS for each route. The objective of this effort is to provide a better basis for the development of the State Transportation Improvement Program (STIP) and to determine the appropriate concept for future highway projects." The RCR also describes the role of the Riverside County Transportation Commission (RCTC) which is responsible for programming 75% of the STIP per Section 188.8 of the Streets and Highway Code amended October 3, 1997. As discussed in **Page 4 <u>CONCEPT RATIONALE</u>** (emphasis shown in bold), "Under the mandate of State law, RCTC is responsible for preparing the County's CMP. The CMP includes all State highways as well as other roads. The CMP established LOS *E* as the minimum LOS Standard for intersections and segments along the CMP system of highways and roadways. Due to the transportation financing program established through *Measure A* in Riverside County, <u>there are no advantages to setting a higher minimum LOS standard than required by the CMP legislation which is LOS *E*</u>

unless the intersection or segment had a lower LOS or LOS *F* in 1991. The analysis done for this RCR shows the 2020 LOS will meet the CMP standard or LOS E."

d) Within Riverside County, SR-78 is a de facto component of the CMP roadway system. As mandated by State law, Riverside County Transportation Commission's (RCTC) Congestion Management Program (CMP) requires LOS E as the minimum standard.

3. **Page 4.11-8, Assessment of Traffic Impacts, Level of Service and Study Locations, Riverside County Transportation Commission, Second Sentence:** Given that the RCTC requires LOS E or above on SR 78, the PSA is incorrect when it finds that an LOS D condition during AM and PM peak periods at one intersection on SR 78 is a significant adverse impact.

4. **Page 4.11-8 - 4.11-9, Assessment of Traffic Impacts, Level of Service and Study Locations, Riverside County Transportation Commission, Last Sentence:** As noted above, if SR 78 is subject to a minimum LOS of E, a LOS D condition at one intersection is not a significant adverse impact.

5. **Page 4.11-9, Assessment of Traffic Impacts, Level of Service and Study Locations, State of California Department of Transportation (Caltrans), Second Bullet**: The PSA states that "Caltrans … recommends that the lead agency consult with Caltrans to determine the target LOS" for individual state highways being analyzed by such lead agency. Please clarify whether Staff has consulted with Caltrans to determine the target LOS for SR 78, especially at 28th Avenue, and include evidence of such recommendation.

6. **Page 4.11-10, First Paragraph:** The language set forth in the PSA describes a single shift work schedule. Please revise the description to reflect the potential to use both a single and double shift schedule. As shown in Appendix Traffic and Transportation 1 (provided at the end of this comment section), during those times when a double shift schedule is implemented, the LOS at modeled intersections will remain at LOS level C or better. Please revise the PSA text as follows:

   During a single shift construction schedule, ~~E~~each construction worker would generally work 10-hour shifts comprising a 40-or 50-hour work week, starting each day between 5 AM and 7 PM and departing between 4 PM and 6 PM. Some construction workers would work 8-hour shifts, arriving between 5 AM and 7 AM like the other workers, but departing earlier between 2 PM and 4 PM. Assuming an additional half hour for lunch, the shifts would be as follows:

   10-hour shift (with a~~n~~ half hour for lunch):
   5 AM – ~~4~~ 3:30 PM (Traveling during peak evening hours[1])
   6 AM – ~~5~~ 4:30 PM (Traveling during peak evening hours)
   7 AM – ~~6~~ 5:30 PM (Traveling during peak morning hours, but departing at end of peak evening hours)

   8-hour shift (with a~~n~~ half hour for lunch):
   5 AM – ~~2~~1:30 PM

[1] "Peak hours" are the hours of the day with the highest traffic volumes. For this project, peak morning hours are estimated to be 7 AM – 9 AM. Peak evening hours are estimated to be 4 PM to 6 PM.

6 AM – ~~3~~2:30 PM
7 AM – ~~4~~3:30 PM (Traveling during peak morning and evening hours)

During a double shift construction schedule, each construction worker would generally work 10-hour shifts comprising a 40-or 50-hour work week. It is anticipated that there will be two shifts, daytime and evening, comprised of 75 percent and 25 percent of the workforce, respectively. Assuming an additional half hour for lunch, the shifts would be as follows:

First Shift – Daytime: 10-hour shift (with a half hour for lunch):
5 AM – 3:30 PM (Traveling during peak evening hours[2])
6 AM – 4:30 PM (Traveling during peak evening hours)
7 AM – 5:30 PM (Traveling during peak morning hours, but departing at end of peak evening hours)

Second Shift – Evening: 10-hour shift (with a half hour for lunch):
4 PM – 2:30 AM (Arriving during peak evening hours)
5 PM – 3:30 AM (Arriving during peak evening hours)
6 PM – 4:30 AM (Arriving during peak evening hours)

7. **Page 4-11.14, Traffic and Transportation Table 6, First and Second Paragraph**: First paragraph are incorrect as worded and contradict the analysis presented earlier in the PSA section. On page 4.11-8, the PSA states that the standard for SR 78 is "E", not "C," as is written here. Please correct the reference on page 4-11.14 to be consistent with page 4.11-8 as shown below. As discussed above, The RCTC sets a minimum LOS E standard for SR 78; therefore LOS D is within the standard. For these reason, please revise the paragraphs as follows:

Prior to project construction, all intersections would operate at LOS A or B, better than the LOS standard of C. During peak construction, traffic delays would increase at almost all intersections, but even with these increased delays, ~~the majority~~ all of the study intersections would continue to operate at an acceptable LOS. ~~However,~~ At two intersections, SR-78 (Neighbours Blvd.)/28th Ave. (evening peak hour) and SR-78 (Rannells Blvd.)/28th Ave. (morning peak hour), ~~would exceed LOS thresholds identified by local jurisdictions. At these intersections,~~ LOS would change from LOS A pre-construction to LOS D during peak construction. (See Traffic and Transportation Table 6.) Because the RCTC sets a minimum LOS E standard for SR78, the intersection would continue to operate at an acceptable LOS and impacts from construction would be less than significant. To mitigate this impact, staff has proposed Condition of Certification TRANS-2, which would require the project owner to prepare and implement a ~~park-and-ride plan for busing construction employees to the project site~~ Traffic Control Plan. With implementation of TRANS-2, the identified intersections would continue to operate at an acceptable LOS during peak construction.

[2] "Peak hours" are the hours of the day with the highest traffic volumes. For this project, peak morning hours are estimated to be 7 AM – 9 AM. Peak evening hours are estimated to be 4 PM to 6 PM.

8. **Page 4-11.14, Direct/Indirect Traffic Impacts and Mitigation, Traffic and Transportation Table 6, First Paragraph, Eighth Sentence:** As currently proposed, TRANS-2 would require implementation of the park-and-ride plan during all phases of construction to mitigate peak construction impacts to traffic level of service (LOS) at two intersections. The PSA states that the Staff may "refine" the proposed condition. It is Applicant's position that no level of bussing would be appropriate because the purported impact is not significant because it complies with the established LOS standard identified on Page 4-11.8.

   Second, the proposed mitigation, even in a "refined" version, will require the expenditure of millions of dollars and is therefore grossly disproportionate to the alleged impact and violates nexus requirements. The bussing plan proposed by Staff will involve the leasing and construction of park and ride lots, operation of a bus fleet, and may require full salary and compensation to all of the workers from the moment they step onto the bus. Such extraordinary costs are not proportional to the temporary delays at a single intersection, during only portions of the day and for a temporary period of time. Applicant recommends that this requirement be deleted, as discussed below under Applicant's comments on the Proposed Conditions of Certification.

9. **Page 4-11.15, Third Full Paragraph, First Sentence:** The Commission has pre-emptive authority over all otherwise applicable local permits, including encroachment permits. Therefore, the CBO should exercise the same review and approval authority for encroachment permits as is done for building permits or other local permits. Applicant recommends that this requirement (further elaborated on in Proposed Condition of Certification TRANS-4) be deleted and the CBO exercise this approval.

10. **Page 4.11-57, Conclusions, First Sentence:** The conclusion is too vague to be meaningful. The terms "clearly visible and prominent" are not defined. The paper does not explain the relevance of these terms to LORS or CEQA and does not define the distances at which the SRSG's are deemed to be "clearly visible" or "prominent". Additionally, no context is provided to define or characterize these vague terms.

11. **Page 4.11-57, Conclusions, Second Sentence:** The paper describes a "relatively high level of brightness", but does not explain what the brightness is related to. The term "distinct visual distraction" is not defined and does not appear to have any scientific context. The assertion of discomfort/disruption at viewing distances up to 8.5 miles is a matter of speculation, without scientific foundation.